

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

KAREN WHITE,

Plaintiff,

v.

CIVIL ACTION NO. 3:12cv00115

BMW OF NORTH AMERICA, LLC.,

Defendant

PLAINTIFF'S OBJECTIONS TO DEFENDANT'S DISCOVERY DESIGNATIONS

COMES NOW, the Plaintiff, KAREN WHITE, by counsel, and objects to Defendant's Discovery Designations as follows:

1. Defendant's Interrogatories. Plaintiff objects on the following grounds:
 - (a) Fed. R. Evid. 402 (Irrelevant);
 - (b) Fed. R. Evid. 403 (Unfairly prejudicial and confusing);
2. Defendant's Request for Production of Documents. Plaintiff objects on the following grounds:
 - (a) Fed. R. Evid. 402 (Irrelevant);
 - (b) Fed. R. Evid. 403 (Unfairly prejudicial and confusing);
3. Plaintiff's Objections to Defendant's Interrogatories. Plaintiff objects on the following grounds:
 - (a) Fed. R. Evid. 402 (Irrelevant);
 - (b) Fed. R. Evid. 403 (Unfairly prejudicial and confusing);
4. Defendant's Rule 26(A)(1) Initial Disclosures. Plaintiff objects on the following grounds:

- (a) Fed. R. Evid. 402 (Irrelevant);
- (b) Fed. R. Evid. 403 (Unfairly prejudicial and confusing);

Respectfully submitted,
KAREN WHITE,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of September, 2012, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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